

IN THE CIRCUIT COURT OF RITCHIE COUNTY, WEST VIRGINIA

SCOTT A. WINDOM,

Plaintiff,

v.

CASE NO. 19-C- 3
The Honorable Timothy L. Sweeney

JASON S. HARSHBARGER,

Defendant.

PLAINTIFF'S MOTION FOR PRELIMINARY INJUNCTION

Comes now the Plaintiff in the above-styled matter by counsel, Rodney C. Windom, Scott A. Windom and Windom Law Offices, PLLC, pursuant to Rule 65 of the West Virginia Rules of Civil Procedure, and moves the Court for a preliminary injunction. As grounds for his motion, the Plaintiff hereby re-alleges and avers the allegations set forth in his *Complaint* filed simultaneously herewith, all of which is incorporated herein by reference. Specifically, the Plaintiff moves the Court for the entry of an Order enjoining the Defendant from intentionally, recklessly, willfully, improperly and repeatedly blocking Plaintiff's comments on the "Delegate Jason S. Harshbarger" Facebook page, thereby violating the Plaintiff's Constitutional rights of free speech insofar as the Plaintiff will be irreparably and permanently damaged if the Defendant's actions are not so enjoined.

SCOTT A. WINDOM
Plaintiff,
By Counsel.

FILED
2019 JAN 24 P 1:42
RITCHIE COUNTY, WV



RODNEY C. WINDOM

W.Va. State Bar #4091

SCOTT A. WINDOM

W.Va. State Bar #7812

Windom Law Offices, PLLC

101 East Main Street

Harrisville, West Virginia 26362

Telephone No. (304) 643-4440

Facsimile No. (304) 643-2947

COUNSEL FOR THE PLAINTIFF